

1 Marion T. Hack (SB #179216)  
[marion.hack@troutman.com](mailto:marion.hack@troutman.com)  
2 Luke Nicholas Eaton (SB #280387)  
[Luke.eaton@troutman.com](mailto:Luke.eaton@troutman.com)  
3 William Taylor (*admitted pro hac vice*)  
[William.taylor@troutman.com](mailto:William.taylor@troutman.com)  
4 **TROUTMAN PEPPER HAMILTON SANDERS LLP**  
350 South Grand Avenue, Suite 3400  
5 Los Angeles, CA 90071  
Telephone: 213.928.9800  
6 Facsimile: 213.928.9850  
7 *Attorneys for*  
*AECOM Technical Services, Inc.*  
8

9 Aaron R. Gruber (SB #209509)  
[agruber@rallsgruber.com](mailto:agruber@rallsgruber.com)  
10 Dylan J. Crosby (SB #299536)  
[dcrosby@rallsgruber.com](mailto:dcrosby@rallsgruber.com)  
11 Ralls Gruber & Niece LLP  
12 1700 S. El Camino Real, Suite 150  
Dan Mateo, CA 94402  
13 Telephone: 650.445.0543  
14 Facsimile: 650.240.2250  
15 *Attorneys for*  
*Pacific Gas and Electric Company*

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **OAKLAND**

19 JH KELLY, LLC

20 Plaintiff,

21 vs.

22 AECOM TECHNICAL SERVICES, INC., et al.

23 Defendant.  
24  
25  
26  
27  
28

Case No. 4:20-cv-05381-HSG (Lead Case)

(Reference withdrawn from Bankruptcy Case No. 19-30088, Adv. Proc. No. 20-03019 and Adv. Proc. No. 19-03008)

(Consolidated with Case No. 3:20-cv-08463-EMC)

**STIPULATED REQUEST TO  
MODIFY BRIEFING SCHEDULE ON  
PG&E'S MOTION TO  
DISMISS/STRIKE RE: AECOM'S  
SECOND AMENDED COUNTER-  
CLAIM [DKT NO. 67]**

1 Pursuant to Civil L.R. 6-2, AECOM Technical Services (“AECOM”), and Pacific Gas and  
2 Electric Company (“PG&E”) (collectively, the “Parties”) jointly seek an order of the Court to  
3 modify the briefing schedule for PG&E’s Motion to Dismiss/Strike re: AECOM’s Second  
4 Counterclaim.

5 The Parties, through their respective counsel, stipulate as follows:

6 WHEREAS, on August 10, 2021, PG&E filed its Motion to Dismiss/Strike re: AECOM’s  
7 Second Amended Counterclaim [Dkt. No. 67], setting a hearing date of November 18, 2021;

8 WHEREAS, on August 17, 2021, the hearing date of PG&E’s Motion to Dismiss/Strike re:  
9 AECOM’s Second Amended Counterclaim [Dkt. No. 67] was reset to November 4, 2021;

10 WHEREAS, per the Federal Rules of Civil Procedure, the last day for AECOM to file  
11 AECOM’s Response to PG&E’s Motion to Dismiss/Strike re: AECOM’s Second Amended  
12 Counterclaim is August 23, 2021;

13 WHEREAS, per the Federal Rules of Civil Procedure, the last day for PG&E to file  
14 PG&E’s Reply to AECOM’s Response to PG&E’s Motion to Dismiss/Strike re: AECOM’s  
15 Second Amended Counterclaim is August 30, 2021;

16 WHEREAS, the Parties wish to focus their time and resources on discovery and  
17 depositions in the coming months;

18 WHEREAS, there have been no previous time modifications in this case related to  
19 PG&E’s Motion to Dismiss/Strike re: AECOM’s Second Amended Counterclaim, but there have  
20 been three (3) other brief time modifications in the case by stipulation of the Parties;

21 WHEREAS, the reason for requesting the enlargement of time related to PG&E’s Motion  
22 to Dismiss/Strike re: AECOM’s Second Amended Counterclaim is so that the Parties may  
23 conserve resources and time to focus on key depositions of witnesses related to the Parties’  
24 claims;

25 WHEREAS, the requested time modification will not impact the schedule for the case.

26 NOW THEREFORE, in consideration of the foregoing, the Parties, by and through their  
27 respective counsel, hereby STIPULATE and AGREE as follows:  
28

1 1. AECOM's deadline to file its Response to PG&E's Motion to Dismiss/Strike re:  
2 AECOM's Second Amended Counterclaim is continued from August 23, 2021 to September 17,  
3 2021;

4 2. PG&E's deadline to file its Reply to AECOM's Response to PG&E's Motion to  
5 Dismiss is continued from August 30, 2021 to October 1, 2021;

6 3. The hearing date for PG&E's Motion to Dismiss shall remain on November 4, 2021.

7 4. By entering into this Stipulation, the Parties do not waive, and expressly preserve any  
8 and all rights and defenses.

9  
10 **IT IS SO STIPULATED.**

11 DATED: August 30, 2021

**RALLS GRUBER & NIECE LLP**

12  
13 By: /s/ Dylan J. Crosby  
14 Aaron R. Gruber  
Dylan J. Crosby

15 *Attorneys for Pacific Gas and Electric*  
16 *Company*

17 DATED: August 30, 2021

**TROUTMAN PEPPER HAMILTON  
SANDERS LLP**

18  
19 By: /s/ Luke N. Eaton  
20 Marion T. Hack  
Luke N. Eaton  
William Taylor

21 *Attorneys for AECOM Technical Services, Inc.*  
22  
23  
24  
25  
26  
27  
28

1 I, Luke N. Eaton, am the ECF user whose ID and password are being used to file this  
2 Stipulation in compliance with Civil L.R. 5-1(i)(3). I hereby attest that the concurrence of the  
3 filing of this document has been obtained from each of the other signatories indicated by a  
4 conformed signature (/s/) within this document.

5 DATED: August 30, 2021

6 By: /s/ Luke N. Eaton  
7 Luke N. Eaton  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28